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PERMIT TO CONSTRUCT

(Alteration/Modification to LF Condensate Collection /Storage System F83427 / A/N 456274)

APPLICANT'S NAME: ORANGE CO., WASTE & RECYCLING, PRIMA

(Previously ORANGE CO. IWMD, PRIMA)

MAILING ADDRESS: 300 NORTH FLOWER STREET, SUITE 400

SANTA ANA, CA 92703-5000

EQUIPMENT ADDRESS: 32250 LA PATA AVENUE

(Prima Deshecha Landfill)

SAN JUAN CAPISTRANO, CA 92675

<u>FACILITY ID.:</u> 052753

EQUIPMENT DESCRIPTION:

MODIFICATIONS TO EXISTING LANDFILL CONDENSATE AND LCRS COLLECTION AND STORAGE SYSTEM PERMIT TO OPERATE F83427, CONSISTING OF:

- 1. PUMP STATION NO. 1, WITH COLLECTION TANK, 3'-2" DIA. BY 6' LONG, ABOVEGROUND, 325 GALLON CAPACITY, HDPE, WITH 2 GPM PNEUMATIC PUMP.
- 2. PUMP STATION NO. 2, WITH COLLECTION TANK, 3'-2" DIA. BY 6' LONG, ABOVEGROUND, 325 GALLON CAPACITY, HDPE, WITH 2 GPM PNEUMATIC PUMP.
- 3. TANK, STORAGE, HDPE, 7'-6" DIA. BY 10'-2" H., 3000 GALLON CAPACITY, WITH VENT VALVE TO FLAME ARRESTOR AND 55 GALLON CARBON UNIT.
- 4. TANK, STORAGE, HDPE, 8'-6" DIA. BY 12'-7" H, 5000 GALLON CAPACITY, WITH SECONDARY CONTAINMENT, VENTED TO FLAME ARRESTOR AND 55 GALLON CARBON UNIT (COMMON TO 3000 GALLON TANK).
- 5. TANK, STORAGE, HDPE, 11'-10" DIA. X 13'-8" H., 11,000 GALLON CAPACITY, WITH VENT VALVE TO FLAME ARRESTOR AND CARBON AIR FILTER, STORING CONDENSATE DRAINED BY GRAVITY FROM THE GAS HEADER LINE.
- 6. TWO (2) TANKS (T-12, T-13), LCRS STORAGE, 14'-0" DIA. X 16'-6" H., 16,000 GALLON CAPACITY, EACH WITH VENT VALVE TO A COMMON 55 GALLON CARBON UNIT.
- 7. TANK (SD-1), SUB-DRAIN STORAGE, 3'-0" DIA. X 4'-0" HIGH, 200 GALLON CAPACITY
- 8. CONDENSATE AND LCRS PIPING AND VALVES, COLLECTING AND TRANSPORTING CONDENSATE AND LCRS.

BY THE ADDITION OF:

9. PUMP STATION NO. 3, WITH COLLECTION TANK, 1'- 6" DIA. BY 2' LONG, ABOVEGROUND, 80 GALLON CAPACITY, HDPE, WITH 13 GPM PNEUMATIC PUMP.

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10. PUMP STATION NO. 4 THROUGH STATION NO. 10, WITH COLLECTION TANK, RANGING FROM 0'- 6" DIA. TO 3' 6" DIA. X 2' TO 6' LONG, ABOVEGROUND, 5 TO 80 GALLON CAPACITY, HDPE, WITH 2 TO 13 GPM PNEUMATIC PUMP.

Conditions:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
 [RULE 204]
- 4. ALL CONDENSATE COLLECTED AND/OR TREATED SHALL BE DISPOSED OF PROPERLY.

 [RULE 402]
- 5. EMISSIONS FROM THE OUTLET OF EACH CARBON UNIT SHALL NOT, AT ANY TIME, EXCEED 50 PPM TOTAL ORGANIC COMPOUNDS MEASURED AS METHANE. [RULE 402]
- 6. ALL CONNECTIONS, VALVES AND OPENINGS SHALL BE PROPERLY SEALED OR CLOSED SO AS TO PREVENT RAW LANDFILL GAS AND/OR CONDENSATE VAPORS FROM ENTERING INTO THE ATMOSPHERE.

 [RULE 402]
- 7. THE OUTLET OF THE CARBON UNITS SHALL BE MONITORED EVERY WEEK FOR TOTAL ORGANIC COMPOUNDS AS METHANE WITH AN ORGANIC VAPOR ANALYZER (OVA) OR EQUIVALENT AND THE RESULTS RECORDED. THESE TESTS SHALL BE PERFORMED DURING THE FILLING OPERATION OF THE TANK(S). [RULE 402]

BACKGROUND:

On June 2, 2009, OC Waste & Recycling –Prima (previously Orange County IWMD) submitted this A/N 499317 for a modification to an existing landfill gas (LFG) condensate collection and storage system permitted under PO F83427 / A/N 456274. Facility proposes to install eight (8) condensate sumps (pump stations No. 3 through 10, inline with the header) with associated pneumatic condensate pump (s).

This is a Title V facility.

Initial Title V Facility Permit (TVFP) was issued on April 26, 2004 to Orange County, IWMD. Title V revision (No. 1) was issued on April 25, 2008 to OC Waste & Recycling.

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New A/N 491771 is also filed for Title V Renewal (TV permit expiration date- 4/27/2009) to include this modified LFG condensate collection and storage system and A/N 492235 for modification to existing LFG collection system permit F38717/ A/N 384568.

This permit is evaluated as PC PO for modification to existing PO. Modifications shown under equipment Description Item No. 3 & 4, *Italic font*.

Originally proposed proposed PC-PO evaluation (June 2009) has been revised to be issued as PC.

CEQA: Notice of Exemption (NOE), with General Rule [Section 15061 (b) (3)] exemption, was filed May 21, 2009 for the proposed modification to the existing LFG condensate collection/storage system. Copy of NOE is included in folder.

PROCESS DESCRIPTION:

Prima Deshecha landfill is an active landfill site. The facility has proposed for modification to the existing LFG condensate collection and storage system (F83427) by installation of eight (8) LFG condensate collection sumps to address the existing and future condensate management issues. As in-place waste settle over time, low points can develop along subsurface pipes that convey LFG and associated liquids generated during the collection process. This can cause surging or blockage and reduce the overall collection efficiency in the system. To prevent such occurrence, condensate sumps are installed to drain and clear these low points. No significant impact to the environment is expected.

VOC Emissions:

No emission is expected from the proposed in-line sumps installations. Condensate from the sumps will be pumped o the existing storage tanks and emission is controlled by carbon air filters. No net increase in emission is expected..

For this application, VOC R1 = R2 = 0 lbs/hr, same as under current PO.

RULES EVALUATION

Compliance with all applicable rules and regulations (mainly 401, 402, 1150.1 & 1401). is expected.

RECOMMENDATIONS:

Issue a Permit to Construct / Operate as shown above, Pgs. 1 & 2.